

Exhibit “S”

From: [Molly R. Brady](#)
To: [Sheridan, Thomas W.](#)
Subject: RE: James Burgess
Date: Wednesday, July 9, 2014 9:24:43 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)

Good morning, Mr. Sheridan

I just wanted to confirm that 10am EST this morning was still good for you? If so, we will call you at 215-977-9500 unless you have another number you would prefer we call?

Thanks,

Molly R. Brady
Legal Assistant
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]
Sent: Thursday, July 03, 2014 2:52 PM
To: Molly R. Brady
Subject: RE: James Burgess

How about 10 am EST on Weds July 9?

Have a great Holiday! Tom



Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
Mailing Address: [424 South Bethlehem Pike, Third Floor](#)
[Fort Washington, PA 19034](#)

Philadelphia Office: [1845 Walnut Street, 21st Floor](#)
[Philadelphia, PA 19103](#)

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

tel: (215) 977-9500
fax: (215) 977-9800

From: Molly R. Brady [<mailto:molly@robertslawfirm.com>]
Sent: Thursday, July 03, 2014 11:06 AM
To: Sheridan, Thomas W.
Subject: James Burgess

Exhibit “T”

From: Molly R. Brady
To: Sheridan, Thomas W.
Subject: RE: James Burgess
Date: Wednesday, July 9, 2014 9:24:43 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)

Good morning, Mr. Sheridan

I just wanted to confirm that 10am EST this morning was still good for you? If so, we will call you at 215-977-9500 unless you have another number you would prefer we call?

Thanks,

Molly R. Brady
Legal Assistant
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Ph: (903) 597-6655 | Fax: (903) 597-1600
molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]
Sent: Thursday, July 03, 2014 2:52 PM
To: Molly R. Brady
Subject: RE: James Burgess

How about 10 am EST on Weds July 9?
Have a great Holiday! Tom



Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
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[Fort Washington, PA 19034](#)

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tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

tel: (215) 977-9500
fax: (215) 977-9800

From: Molly R. Brady [<mailto:molly@robertslawfirm.com>]
Sent: Thursday, July 03, 2014 11:06 AM
To: Sheridan, Thomas W.
Subject: James Burgess

Exhibit “U”

From: Blane Carriffee
To: Sheridan, Thomas W.
Cc: Randell (Randy) C. Roberts; Molly R. Brady; Rhonda Krisle
Subject: 8888-1351 Burgess, James R.: James Burgess
Date: Thursday, July 10, 2014 11:17:29 AM
Attachments: image001.jpg

Tom – After the conference call yesterday, I looked back through our file and determined our client's comp claim is being administered by Department of Labor and Industry, Bureau of Workers' Compensation for the Commonwealth of Pennsylvania. Liberty Insurance is the workers' compensation carrier. The claim number is WC390-A89478. Let me know if you have any questions or need any additional information. --- Blane

Blane Carriffee

Investigator

118 W. Fourth St. Tyler, TX 75701

Ph: (903) 597-6655 | Fax: (903) 597-1600

blane@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



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Exhibit “V”

From: Molly R. Brady
To: Sheridan, Thomas W.
Cc: Randell (Randy) C. Roberts; Blane Carrifee; Rhonda Krisle
Subject: James Burgess
Date: Friday, August 29, 2014 4:25:15 PM
Attachments: image001.jpg

Mr. Sheridan,

Are you available for a telephone conference with Mr. Roberts next Wednesday, September 3, 2014 to discuss James Burgess's case? If so, please let me know what time works best for you and we will call you at that time. If not, please let me know several other dates and times that would be good for you and we will get something set up during those times.

Thanks,

Molly R. Brady
Legal Assistant
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



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Exhibit “W”

From: Randell (Randy) C. Roberts
To: Molly R. Brady; Sheridan, Thomas W.
Cc: Blane Carriffee; Rhonda Krisle
Subject: RE: James Burgess
Date: Saturday, September 6, 2014 5:35:09 PM
Attachments: image001.jpg

Tom,

Please get back to us about effectuating this referral as soon as you can. I am heading into a major trial in early October and I want to be sure that I have put Mr. Burgess in good hands before then. Thanks --- Randy

Randell (Randy) C. Roberts

Attorney at Law
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
Board Certified - Personal Injury Trial Law
Texas Board of Legal Specialization

cid:image001.jpg@01CDCE50.B4058AA0



From: Molly R. Brady
Sent: Friday, August 29, 2014 3:25 PM
To: Sheridan, Thomas W.
Cc: Randell (Randy) C. Roberts; Blane Carriffee; Rhonda Krisle
Subject: James Burgess

Mr. Sheridan,

Are you available for a telephone conference with Mr. Roberts next Wednesday, September 3, 2014 to discuss James Burgess's case? If so, please let me know what time works best for you and we will call you at that time. If not, please let me know several other dates and times that would be good for you and we will get something set up during those times.

Thanks,

Molly R. Brady
Legal Assistant
118 W. Fourth St. Tyler, TX 75701
Ph: (903) 597-6655 | Fax: (903) 597-1600
molly@robertslawfirm.com

cid:image001.jpg@01CDCE50.B4058AA0



Exhibit “X”

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Cc: [Molly R. Brady](#); [Blane Carrifee](#); [Rhonda Krisle](#)
Subject: Re: James Burgess
Date: Tuesday, September 9, 2014 7:35:49 PM
Attachments: [image002.jpg](#)
[image003.jpg](#)

Sure; when works for you?

Randell C. Roberts

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randy@robertslawfirm.com
www.robertslawfirm.com

On Sep 9, 2014, at 6:32 PM, "Sheridan, Thomas W." <tsheridan@sheridanandmurray.com> wrote:

Randy,

do you have any time tomorrow we are we can talk about this and finalize it?

Please let me know. Thanks, Tom

<image002.jpg>

Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
Mailing Address: [424 South Bethlehem Pike, Third Floor](#)
[Fort Washington, PA 19034](#)

Philadelphia Office: [1845 Walnut Street, 21st Floor](#)
[Philadelphia, PA 19103](#)

tsheridan@sheridanandmurray.com
<http://www.sheridanandmurray.com>

tel: (215) 977-9500
fax: (215) 977-9800

From: Randell (Randy) C. Roberts [<mailto:randy@robertslawfirm.com>]
Sent: Saturday, September 06, 2014 5:35 PM
To: Molly R. Brady; Sheridan, Thomas W.
Cc: Blane Carrifee; Rhonda Krisle
Subject: RE: James Burgess

Tom,

Please get back to us about effectuating this referral as soon as you can. I am heading into a major trial in early October and I want to be sure that I have put Mr. Burgess in good

Exhibit “Y”

From: [Randell \(Randy\) C. Roberts](#)
To: [Sheridan, Thomas W.](#)
Subject: Re: Burgess
Date: Thursday, September 11, 2014 7:09:31 PM
Attachments: [image001.jpg](#)

Thanks Tom; I will try to get everything signed and back to you next week. ---- Randy

Randell C. Roberts

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randy@robertslawfirm.com
www.robertslawfirm.com

On Sep 11, 2014, at 5:24 PM, "Sheridan, Thomas W." <tsheridan@sheridanandmurray.com> wrote:

Randy,
As a follow-up to our discussion yesterday, attached please find my firm's standard fee agreement for Mr. and Mrs. Burgess. Please let me know if you have any questions or concerns regarding any language in the proposed fee agreements. Also, I have attached a letter to you acknowledging your referral of these matters to me and my firm and our commitment to pay you a 40% referral fee. If the fee agreements are satisfactory to you, I would appreciate it if you would have the clients execute them and return them to me so that we can expeditiously undertake their representation. Again, I would like to thank you for your consideration of me in my firm to handle these important matters.
Please call me or email me with any questions or concerns.
Sincerely, Tom

[cid:image001.jpg@01CC05CC.7D334100]

Thomas W. Sheridan
Trial Attorney

Sheridan & Murray, LLC
Mailing Address: 424 South Bethlehem Pike, Third Floor
Fort Washington, PA 1903<<http://maps.yahoo.com/py/maps.py?Pyt=Tmap&addr=1600+Market+Street%2C+25th+Floor&csz=Philadelphia%2C+PA+19103&country=us>>4

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<http://www.sheridanandmurray.com><<http://www.sheridanandmurray.com>>

tel:
fax:

(215) 977-9500
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Exhibit “Z”

RANDELL C. ROBERTS

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American Board of Trial Advocates

MICHAEL ACE

*Board Certified - Personal Injury & Civil Trial Law
American Board of Trial Advocates

*Texas Board of Legal Specialization

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ROBERTS & ROBERTS



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ATTORNEYS AT LAW

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Tyler, Texas 75701-4000

BRUCE L. ROBERTS

*Board Certified - Personal Injury Trial Law

KAREN R. ROBERTS

NICANOR PESINA, JR.

Tel: (903) 597-6655

Fax: (903) 597-1600

September 18, 2014

VIA EMAIL
AND
FEDERAL EXPRESS

Mr. Thomas W. Sheridan
Sheridan & Murray, LLC
424 Bethlehem Pike, Third Floor
Fort Washington, PA 19034

Re: Clients : James R. Burgess &
Kay S. Burgess
Date of
Accident : December 14, 2012

Dear Tom:

Thank you for allowing me to refer James and Kay Burgess for further representation in their claims against Clarks Electrical Contractors, Inc. They are wonderful people and I look forward to introducing them to you.

In accordance with your request, I am enclosing with the original of this letter a disk containing all of my relevant file materials, your Standard Engagement Agreement and Power of Attorney, and Consent to Refer executed by each client. The materials on this disk include Bobby McLean's investigation as well as the deposition of Brian Zimmerman which were previously forwarded to you.

I have previously purchased exemplar lights (a four foot light like the one involved in the accident and a two foot light). Please let me know if you wish for me to ship them to your office.

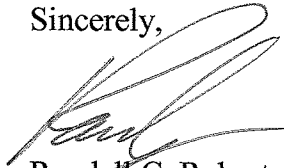
Mr. Thomas W. Sheridan

Page 2

September 18, 2014

My office will copy you on all further communications and I would appreciate your office doing the same for me. Thank you once again for your professional assistance in this unfortunate matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Randell C. Roberts", with a stylized flourish at the end.

Randell C. Roberts
For the Firm

RCR/rlk

Enclosures

cc: Mr. & Mrs. James R. Burgess
160 VZCR 2724
Mabank, TX 75147

Exhibit “AA”

[REDACTED]

[REDACTED]

From: Sheridan, Thomas W.
Sent: Wednesday, February 7, 2018 7:27 PM
To: randy@robertslawfirm.com
Cc: Thomas W. Sheridan Esquire (tsheridan@sheridanandmurray.com) <tsheridan@sheridanandmurray.com>
Subject: FW: 1497-001 Burgess, James R.: Referral Fee Agreement

Randy,
Thanks for taking the time to speak to me earlier today about the Burgess case and our fee sharing agreement. I am writing to confirm our discussion and to specifically clarify and document our referral agreement on this matter.

Mr. Burgess and Mrs. Burgess have each entered into a fee agreement with my firm to represent them for any and all claims arising from Mr. Burgess's December 14, 2012 accident that rendered him a quadriplegic.

Prior to referring this matter to my firm, you had engaged in discussions with representatives from Defendant Clark Electric regarding the potential settlement of this matter.

In light of this, my firm and I have agreed to pay you a referral fee in the amount of 40% of any fee recovered by my firm against Defendant Clark Electric only, which has policy limits in this matter of \$2 million.

We have specifically agreed that neither me nor my firm is obligated to pay you and/or your firm a referral fee from any recovery made against any other defendant named or joined in this case (including but not limited to Dialight, any of the National Oilwell Varco entities, Cabot Oil or any of the Patterson entities). Any referral fee paid to you from this matter will be expressly limited to 40% of any recovery from Defendant Clark Electric's \$2 million insurance policy.

We have agreed that the maximum referral fee payable from my firm to your firm in this case would be \$320,000 calculated as follows:

If my firm is able to settle Mr. and Mrs. Burgess' claims against Clark electric for its full \$2 million insurance coverage, and we obtain a fee in the amount of 40% of the gross recovery (\$800,000), our maximum referral fee payable to you will be \$320,000 (\$800,000 times .40 = \$320,000). To the extent any settlement with Clark Electric is in an amount less than \$2 million, you will be entitled to a referral fee of 40% of the gross fee recovered by my firm from Clark Electric's insurance coverage.

Please confirm that this email accurately reflects our full and final agreement and supersedes any prior agreement (including my letter to you dated September 11, 2014).

Sincerely,
Tom

Exhibit “BB”

Subject: 1497-001 Burgess, James R.: Referral Fee Agreement

From: Randell Roberts

Sent: Wednesday, February 7, 2018 8:40 PM

To: 'Sheridan, Thomas W.' <tsheridan@sheridanandmurray.com>

Subject: RE: 1497-001 Burgess, James R.: Referral Fee Agreement

Confirmed, and good luck Tom.

Randell C. Roberts

Attorney at Law

Roberts & Roberts

www.robertslawfirm.com

[118 W. Fourth St. Tyler, TX 75701](http://118.W.Fourth.St.Tyler.TX.75701)

Ph: [\(903\) 597-6655](tel:(903)597-6655) | Fax: [\(903\) 597-1600](tel:(903)597-1600)

Board Certified - Personal Injury Trial Law

Texas Board of Legal Specialization

randy@robertslawfirm.com

www.robertslawfirm.com

From: Sheridan, Thomas W. [<mailto:tsheridan@sheridanandmurray.com>]

Sent: Wednesday, February 7, 2018 6:27 PM

To: Randell Roberts <randy@robertslawfirm.com>

Cc: tsheridan@sheridanandmurray.com

Subject: FW: 1497-001 Burgess, James R.: Referral Fee Agreement

Randy,

Thanks for taking the time to speak to me earlier today about the Burgess case and our fee sharing agreement.

I am writing to confirm our discussion and to specifically clarify and document our referral agreement on this matter.

Mr. Burgess and Mrs. Burgess have each entered into a fee agreement with my firm to represent them for any and all claims arising from Mr. Burgess's December 14, 2012 accident that rendered him a quadriplegic.

Prior to referring this matter to my firm, you had engaged in discussions with representatives from Defendant Clark Electric regarding the potential settlement of this matter.

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We have agreed that the maximum referral fee payable from my firm to your firm in this case would be \$320,000 calculated as follows: